

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EDWARD T. KENNEDY,

Plaintiff,

v.

**EQUIFAX INC.; RICHARD F. SMITH,
IN HIS OFFICIAL AND INDIVIDUAL
CAPACITIES; AMERICAN BANKERS
INSURANCE COMPANY OF FLORIDA,
A STOCK INSURANCE COMPANY;
BARBARA LOPEZ, IN HER OFFICIAL
AND INDIVIDUAL CAPACITIES; and
STEVEN CRAIG LEMASTERS; IN HIS
OFFICIAL AND INDIVIDUAL
CAPACITIES,**

Defendants.

CIVIL ACTION NO.: 5:18-cv-00214-JLS

**DEFENDANTS RICK SMITH AND EQUIFAX, INC.'S RESPONSE TO
PLAINTIFF'S MOTION TO DISQUALIFY COUNSEL**

Defendants Rick Smith ("Smith") and Equifax Inc. ("Equifax") hereby file their joint Response to Plaintiff's Objection to the *Pro Hac Vice* Application of Misty L. Peterson and Motion to Disqualify (hereinafter "Plaintiff's Motion," ECF Nos. 38, 39). Plaintiff's Motion should be denied as moot, as this Honorable Court has granted Ms. Peterson's application to practice in this Court (ECF No. 40). Ms. Peterson has complied with Local Rule of Civil Procedure 83.5.2(b) in seeking admission to practice in this matter.

For the foregoing reasons, Defendants Smith and Equifax respectfully request the Court to deny Plaintiffs' Motion, and grant all other relief as the Court deems proper.

Respectfully submitted this 5th day of October, 2018.

CLARK HILL PLC

/s/Jonathan D. Klein

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ATTORNEYS FOR DEFENDANTS
RICK SMITH AND EQUIFAX INC.

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2018, I electronically filed **DEFENDANTS RICK SMITH AND EQUIFAX, INC.'S RESPONSE TO PLAINTIFF'S MOTION TO DISQUALIFY COUNSEL** with the Clerk of the Court using the CM/ECF system, and I have served a copy on the following by causing a copy of the same to be deposited in the United States Mail, postage prepaid and addressed as follows:

Edward T. Kennedy
401 Tillage Rd.
Breinigsville, PA 18031

s/ Jonathan D. Klein
Jonathan Klein